

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

American Civil Liberties of Missouri)	
Foundation, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 2:13-cv-4223
)	
George A. Lombardi,)	
)	
Defendant.)	

Affidavit of Diane Balogh

I, Diane Balogh, being first duly sworn upon my oath, state the following:

1. I am currently the Communications Specialist at the American Civil Liberties Union of Missouri Foundation (ACLU-MO); am over the age of 18; am legally competent to make a affidavit; and do so on the basis of personal knowledge.
2. Between October 8, 2013, and October 22, 2013, there were more than 460 views of the ACLU of Missouri's webpage dedicated to the records.
3. The average time visitors remained on the page exceeded twenty minutes.
4. As a result of the new execution protocol, I removed the records from the ACLU-MO website.
5. Since removing the records from the ACLU-MO website, I have received requests from two media outlets for copies of the records that disclose the identity of members of the execution team.
6. I have not fulfilled those requests because of § 546.720.

Further I sayeth not.

Diane K. Balogh

Subscribed and sworn to before me on October 23, 2013, by the individual personally
known to me as Diane Balogh.

Grant R. Doty
Notary Public

GRANT R. DOTY
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires March 12, 2017
Commission # 13760996